

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA :

Plaintiff, :

v. : Civil No. 02-2303

MANUEL R. LAGMAY :

Defendant. :

JOINT MOTION TO EXTEND SUMMARY JUDGMENT MOTIONS DEADLINE

The parties hereby respectfully move this Court for entry of the attached Consent Order extending the summary judgment motion deadline by forty-five (45) days, and in support thereof, state as follows:

1. The deadline for summary judgment motions in this matter is currently set for February 24, 2006.
2. Due to the fact that the Defendant was out of town on business, the Plaintiff was not able to take the deposition of the Defendant as previously scheduled. The deposition of the Defendant has now been rescheduled for March 9, 2006.
3. The parties request that this Court extend the deadline to file summary judgment motions by forty-five (45) days to April 10, 2006 in order to allow the Plaintiff time to depose the Defendant.

WHEREFORE the parties request that this Court enter the attached Consent Order extending the summary judgment motion deadline by forty-five (45) days.

Respectfully submitted,

/s/ Michael F. Callahan_____
Michael F. Callahan, Esquire
THYDEN, GROSS & CALLAHAN
4601 Willard Avenue
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(301) 907-4580
Counsel for Defendant

/s/ Jonathon D. Carroll (by M. Callahan)
Jonathan D. Carroll, Esquire
Trial Attorney
Post Office Box 227
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Counsel for Plaintiff

CERTIFICATE OF ORIGINAL SIGNATURES

I HEREBY CERTIFY that the terms of the foregoing Joint Motion are identical to those set forth in the original; and the signatures represented by the “/s/” symbols on such copy reference the signatures of consenting parties on the original.

/s/ Michael F.Callahan_____
Michael F. Callahan